

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:22-cv-597

JENNIFER DUNBAR, President of  
the Cabarrus Republican Women,

Plaintiff,

vs.

ADDUL RAHMAN EL ALI,  
individually and in his official  
capacity as Chairman of the  
Cabarrus County Republican Party,  
*et al.*,

Defendant.

**AFFIDAVIT OF ADDUL RAHMAN EL ALI**

ADDUL RAHMAN EL ALI, being first duly sworn, deposes and says as follows:

1. My name is Addul Rahman El Ali and I am an adult citizen and resident of Cabarrus County, North Carolina. I make this affidavit of my own personal knowledge.
2. I am the Chairperson of the Cabarrus County Republican Party. I was elected to this position at the 2021 Cabarrus County Republican Party Convention. My opponent in that election was Jennifer Dunbar. Ms. Dunbar also previously ran for County Chairperson at the 2019 County Convention.
3. Prior to serving as Chairperson, I was an elected member of the Cabarrus County Republican Party Executive Committee and served on the Committee in that capacity from 2019-2021. I have been active in the Cabarrus County Republican Party since 2017.
4. The Cabarrus County Republican Party is governed by the "Republican Party Plan of Organization, Cabarrus County, North Carolina" (the "County Plan"), a true

copy of which is attached to this affidavit as "Exhibit A."

5. The Cabarrus County Republican Party derives its powers from the North Carolina Republican Party, and is subject to the "North Carolina Republican Party Plan of Organization" (the "State Plan"), a true copy of which is attached to this affidavit as "Exhibit B."

6. Pursuant to the current County Plan, the Executive Committee of the Cabarrus County Republican Party consists of the 4 officers who are elected at the County Convention; 14 at-large members who are also elected at the County Convention; the County Finance Chairperson; the immediate past County Chairperson; and the President or Chairperson of a Federated Cabarrus County Chapter of the following organizations: the Young Republicans, the Republican Women's, the Republican Men's, and the Teenage Republicans. (See Ex. A, County Plan, Art. III(B)(1)). The Officers and Committee serve for a 2-year term, until the next odd-year County Convention.

7. Jennifer Dunbar is a current member of the County Executive Committee by virtue of her serving as President of the Cabarrus Republican Women, which is a federated chapter of the Republican Women's Club.

8. Article IX(6)(a) of the State Plan provides that a member of a County Executive Committee may be removed for (i) gross inefficiency, (ii) party disloyalty, or (iii) failure to comply with the Plans of Organization, by a two-thirds vote of the Committee upon being furnished a written notice of such charges by one-third of the members of the Executive Committee. (See Ex. B, State Plan, Art. IX(6)(a)).

9. In the opinion of myself and others on the Executive Committee, Ms.

Dunbar has actively worked contrary to the efforts of the Committee. Some of the actions of Ms. Dunbar in not supporting, and in fact acting against, the efforts of the Executive Committee on which she sits has resulted in members of the Executive Committee providing written notice to Ms. Dunbar of charges of gross inefficiency under Article IX(6)(a) of the State Plan. A true copy of the written notice that was delivered to Ms. Dunbar is attached hereto as "Exhibit C" (the "Notice").

10. Prior to providing the Notice to Ms. Dunbar, the County Party sought guidance from the Chief Legal Counsel for the North Carolina Republican Party. In the opinion of the Chief Counsel, "acting outside the will of the [Executive] Committee could be viewed" as "gross inefficiency" as the term is used in Article IX(6)(a) of the State Plan. The opinion of the Chief Counsel is quoted in the Notice to Ms. Dunbar.

11. The Notice was delivered to Ms. Dunbar on July 18, 2022, informing her that the Executive Committee would consider her removal at a meeting on August 2, 2022.

12. Prior to receiving a copy of the lawsuit that Ms. Dunbar's attorney filed on July 29, 2022, I was never made aware of any claim by Ms. Dunbar, or anyone else, of alleged gender discrimination within the County Party.

13. My platform in running for Chairperson was to make the County Party more inclusive. I am African-American, which is a demographic that I believe has been underrepresented in leadership in Party. After becoming Chairperson, one of the first things that our Executive Committee did was to launch a campaign promoting the GOP as a party of all races and genders. For example, outside of our County Party Office, we have a large mural showing racial minorities and women with the caption "The GOP



Looks Like Me.” Ms. Dunbar did not participate in any of these efforts.

14. Since my term as Chairperson began, there have been two at-large vacancies on the Executive Committee, and we have filled both of those vacancies with women. The first was we appointed Britt McIntyre in April 2022 following the resignation of Frank Rush. The second was we appointed Mary Ingram in May 2022 following Parish Moffitt resigning as Secretary and moving to Finance Chairperson.

15. There was also a vacancy that was filled by a woman while I was an at-large member of the Executive Committee from 2019-2021. Tania Shaw was appointed in 2019 following the resignation of Hunter Moore.

16. In February 2020, State Representative Linda Johnson passed away. The Executive Committee was tasked with appointing a successor for the remainder of Rep. Johnson’s term, and we appointed a woman, Dr. Kristin Baker.

17. I have attended numerous functions of the Republican Women’s Club and have supported them many ways, including financially. I have also offered the use of our County Party Office to the Women’s Club to hold meetings and events, but they have not taken me up on that offer.

18. I also serve as chairman of the North Carolina GOP Black Conservative Voices Coalition, where I recruited a predominantly female board. I was also the keynote speaker at the North Carolina Federation of Republican Women’s State Convention Dinner last year.

19. In 2019, there was an issue concerning whether the Cabarrus County Chapters of the Republican Women’s Club and the Republican Men’s Club were federated such that their Presidents would sit on the Executive Committee. Paperwork

was received immediately from the Republican Men's Club regarding their federated status. We also sought paperwork from the Republican Women's Club, which was not promptly received, and there was a delay in seating the then-President of the Women's Club (who was not Ms. Dunbar) on that Executive Committee. We also amended the County Plan at the 2021 Convention to make clear that the Presidents of all auxiliary clubs, including the Women's Club, would be automatically seated on the Executive Committee to avoid further issues. There was never any delay in seating Ms. Dunbar on the Executive Committee as the President of the Women's Club in 2021.

20. Ms. Dunbar has long made no secret of her desire to frustrate the efforts of the Executive Committee on which she sits. At the 2021 County Convention, after I defeated Ms. Dunbar in the election for County Chairperson, I attempted to speak to her in an effort for us to work forward together on the same team. Her response to me was, "fuck you, we will never be on the same team."

21. While I served on the Executive Committee in 2019, Ms. Dunbar (who was not a member of the Executive Committee at that time) raised issues at an Executive Committee meeting regarding alleged "party disloyalty" by two Committee members relating to a non-partisan City Council race. I sided with the majority of the Committee in determining that there was no such "disloyalty." After that meeting, Ms. Dunbar texted me "you're a fucking Judas."

22. Article X(C)(1) of the State Plan and Article VIII(C)(1) of the County Plan provide that any disputes within the County Party shall be decided by an Arbitration Committee consisting of the State Chairman, State Vice-Chairman, National Committeeman, National Committeewoman and General Counsel for arbitration.

This the 2<sup>nd</sup> day of August, 2022.

  
Abdul Rahman El Ali

Sworn to and subscribed before me  
this the 2<sup>nd</sup> day of August, 2022.

  
Notary Public  
My commission expires: 03-30-2026

